

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

JJD:LTG/JLG F. #2018R00279

610 Federal Plaza Central Islip, New York 11722

April 1, 2019

## By Federal Express and ECF

Larry H. Krantz, Esq. Krantz & Berman LLP 747 Third Avenue, 32<sup>nd</sup> Floor New York, NY 10017

Alan M. Vinegrad, Esq. Covington & Burling LLP The New York Times Building 620 Eighth Avenue New York, NY 10018-1405

Re: United States v. Christopher McPartland and Thomas J. Spota

Criminal Docket No. 17-587 (JMA)

## Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

The enclosed disc is being produced pursuant to the terms of the parties' March 19, 2019 Stipulation and Order (the "Protective Order"). The materials contained herein have been stamped with control numbers SCDA 000516528 through SCDA 000578064, and constitute the government's further production of the electronically-saved files, e-mails, and calendars maintained by the Suffolk County Department of Information Technology for the time period between and including December 14, 2012 and December 31, 2017, relating to the following individuals: Thomas Spota, Christopher McPartland,

James Burke,

These materials are being provided to you via a third party data hosting and processing company. Additional materials will be provided on a rolling basis, as they become available.

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Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: <u>/s/</u>

John J. Durham Lara Treinis Gatz Justina L. Geraci Assistant U.S. Attorneys

Assistant U.S. Attorneys (631) 715-7851/-7913/-7835

Enclosure.

cc: Clerk of the Court (JMA) (by ECF) (redacted) (without enclosure)

Any materials that may be subject to the attorney-client privilege with respect to any of the listed individuals have been segregated, for further review by a taint team. If and when such materials are deemed non-privileged, they will be produced on a rolling basis as that determination is made.